

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

JIA SHENG,

Plaintiff,

v.

M&T BANK CORPORATION, and
MANUFACTURERS & TRADERS TRUST
COMPANY, d/b/a M&T BANK,

Defendants.

No. 12 Civ. 01103 (HBS)

NOTICE OF PLAINTIFF'S MOTION IN LIMINE

PLEASE TAKE NOTICE, that upon the annexed Declaration of Ariel Y. Graff, dated September 15, 2014, the exhibit annexed thereto, the accompanying memorandum of law, and upon all of the prior pleadings and proceedings herein, Plaintiff Jia Sheng, by her undersigned counsel, will respectfully move this Court before the Honorable Hugh B. Scott, in the United States Courthouse, located at 2 Niagara Square, Buffalo, NY 14202-3498, at a date and time to be fixed by the Court, for an Order granting Plaintiff's motion *in limine*, pursuant to FRE 401, 402, 403 and 408, to exclude certain evidence at the trial of this action, which is scheduled to commence on November 3, 2014.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Order of this Court, dated June 2, 2013, opposition papers, if any, shall be served and filed by September 29, 2014, and Plaintiff intends to file reply papers by October 6, 2014.

Dated: September 15, 2014

Respectfully submitted,

THE OTTINGER FIRM, P.C.

By: 
Ariel Y. Graff
George D. Vallas

401 Park Avenue South
New York, New York 10016
Telephone: (212) 571-2000
Facsimile: (212) 571-0505
ari@ottingerlaw.com
george@ottingerlaw.com

COUNSEL FOR PLAINTIFF

TO: Sean D. Ronan
M&T Bank
Legal Department, 12th Floor
One M&T Plaza
Buffalo, New York, 14203
Telephone: (716) 842-5401
Facsimile: (716) 842-5376

COUNSEL FOR DEFENDANTS